Alternative Site Analysis

When searching for a site for the AT&T "Lyons Valley" search ring, our goal was to cover the objective utilizing a single installation if possible. Since wireless coverage works on a line-of-sight basis, the higher a site location is, typically the better job it will do with coverage. As the site development team investigated this area, we observed the mountain located to the north of the Lyons Valley Trading Post / town center area. After investigation, we determined that there was a viable project location on this mountainside, with the ability to cover the objective, and also having sufficient electrical power available.

Once we determined that the site was available, that there were no significant impediments to construction, and that the location would serve our objective, we selected this candidate for our site. Our search for a higher-preference land use category revealed no higher-preference land uses available in the surrounding area. Utilizing this communications site, with its superior topographical position, will allow the AT&T antennas to be located approximately 200 feet above the level of the roadway and valley areas below. This would allow the coverage objective to be achieved with the use of a single facility. A site located at or near the level of the valley floor would cover only a small percentage of the footprint represented on the attached RF coverage maps, and would require approximately 3 total sites to achieve the same coverage footprint.

Preference Categories

Section 6986 of the Telecommunications Ordinance (Preferred Sites) identifies the preference categories assigned to proposed zones and locations. The project site is zoned A-72, which is not a preferred zone for telecommunications facilities. The project location is on a site that is mostly undeveloped, surrounded by rock outcroppings and foliage, which functions to help camouflage the proposed collocation. Although this design is defined as "high visibility" according to the County's Wireless Ordinance because it ~~exceeds the height and is a tree design,~~ has exposed antennas on the legs of the existing water tank; however, it is the most appropriate design for the subject site. ~~The proposed faux tree design will appear as a natural landscape element that would blend in with the surrounding environment as accepted elements in the public's view.~~ The proposed design will appear as an intended element on the tank legs that would blend in with the existing lattice structure supporting the water tank.

When searching for a site for this AT&T search ring, the original goal was to address the coverage objective utilizing the fewest number of installations possible. The site search first attempted to identify preferred zones and land uses, as required by the Municipal Code.

Below is a list categories that the site development team explored prior to arriving at the proposed location.

- *Preferred Zones: Industrial and Commercial*
  Within and around the project search ring there are no industrial or commercial zones. Due to the topographical variations within the area, this particular search ring was extremely narrow. The surrounding area is solidly agricultural/residential zoning and land use character of the project area (entirely A72 zoning). There are no industrial or commercial sites within the search ring area that would function from an RF perspective. The nearest commercially zoned parcel is located at 17510 Lyons Creek Road, which is roughly 3 miles away from the subject property. This property is over 100' lower in elevation and would not provide the needed propagation signal.

- *Preferred Locations:*

  - *Public Right of Way / Utility Poles*
    Public right-of-way solutions were sometimes relied upon with earlier generation wireless facilities when the requirements for data capacities were less and quick voice only coverage solutions were acceptable. The current generation AT&T broadband installation requires a minimum of 200-square-feet of base station area and the capacity to carry 12 panel antennas. No public right-of-way location was identified that could accommodate the AT&T facility required to provide adequate coverage and service level to the target area. Again, the significant topographical constraints of the surrounding area make utilities poles obsolete.

  - *Water Tanks*
    Water tank sites are preferred solutions for wireless sites since they represent a non-residential land use, frequently located within residential areas and located on high ground. However, we were unable to identify any water tank facilities in the search ring that could satisfy the coverage objective. The nearest water tank facility is located to the northeast off of Lyons Valley Road, between Chaparral Heights Road and Loma Estates Court. This property is located almost 500' AMSL below the original candidate ("Buckel property" discussed further below) and almost 600' AMSL below the subject property on Leoney Lane. This site would not provide any coverage to the Lyons Valley Road stretch to the east toward Daley Truck Trail.

  - *Non-Residential Land Uses*
    Opportunities for any non-residential land uses were examined. Our search for non-residential land uses included commercial sites, parks, fire stations, schools, churches, community centers and open space areas. However, we were unable to identify any

non-residential land uses in the search area that would meet the coverage objective due to the topography of the community.

- *Collocation Opportunities*
  Originally when this search ring was issued in 2011, there were no collocation opportunities available that met the RF coverage objective at the time. However, after proceeding in zoning on a raw land Buckel property, which is a vacant parcel south of the intersection of Castle Peak Lane and Skyline Truck Trail in the A-72 zone (APN 519-210-37-00), at the request of the CPG and PDS, AT&T considered a collocation site in the community. This site is located at the subject property at 15598 Leoney Lane and is discussed in detail below.

- *Agricultural/Residential Parcels*
  The subject site is on an agriculturally zoned (A72) parcel. Before settling on the proposed site, we had explored one other property in the same zone.

Winding roads and significant changes in elevation necessitate a new cell site as proposed in the Indian Valley search ring. An application for a wireless facility was submitted for a site on Skyline Truck Trail in July 2012 (MUP12-014 Buckel Wireless). This project was intended to fulfill the coverage objective for this same Indian Valley search ring. The Buckel property does not have any existing cell site, and is therefore considered "Raw Land" (as opposed to a collocation site). However, at the request of the community planning group as well as Planning & Development Services, AT&T decided to consider an alternative location at the current site, 15598 Leoney Lane, located further south and to the east from the original Buckel candidate. In order to meet the coverage objective at a very different location, AT&T's original proposal was to remove the existing Verizon water tank and replace it with a taller tank in order to get the needed height. This design was submitted for staff's review, and an Initial Consultation meeting was conducted on March 14, 2014. Due to loss in funding across the County in 2014, this project was cancelled soon after. The feasibility of replacing the water tank with a taller one was not possible due to reduced funding and logistics of taking another carrier off-air for the duration of the construction period.

As part of its fixed wireless local loop (FWLL) service, AT&T has committed to provide broadband services to 13 million more rural homes and businesses through wireless connection rather than traditional copper/fiber. AT&T now has minimal funding to proceed with the proposed project at Leoney Lane with renewed objective to not only provide the needed network coverage objective on the surrounding roadways for mobile services and capacity but now also to provide WLL technology. This technology provides home phone and high-speed broadband Internet service through a link to the nearest cell tower. The FWLL technology means that AT&T can help provide quality phone service and high-speed broadband coverage to areas that do not have the fiber infrastructure to provide these services.

In April 2016, Kevin Becker from AT&T and Danielle Weizman from M&M Telecom met with Jarrett Ramaiya to discuss several resurrected projects, including this project. When discussing this particular project, Jarrett indicated that collocating on the existing tower legs with a

minimum antenna layout would likely be preferable to the two alternatives on this property: 1) the original design discussed in the IC meeting from 2014 of raising the height of the existing tower, or 2) building a second tower solely for AT&T. The design now submitted for modification to the Verizon permit is consistent with this discussion.

In addition, the timeliness of the site is benefitted by collocation as the site will not take as long to come on-air and begin to serve users. Any other location in the vicinity would likely require biological mitigation, pose impacts to views and lack the established screening of the proposed collocation.

Public Benefit

The serious lack of coverage in and around the project area has significant public safety considerations. The majority of 911 calls are now placed by wireless telephone, and many of the emergency responders now rely upon the wireless networks to a large degree for their communications. The proposed wireless facility would be E-911 compliant, meaning that emergency calls placed from the wireless phones of other carriers would connect through the proposed AT&T site. In such hilly areas, regular radio communications may not be reliable, but the cellular networks provide secure communications for areas having network coverage. Also, the wireless systems have the ability to locate lost, injured or stranded persons with the GPS aspect of the cellular networks. These rural communities of the County are vulnerable to isolation in the event of wildfires, earthquakes or other public emergencies if regular landline communications become severed. The installation of the proposed AT&T facility would greatly enhance personal, business and emergency communications for this rural community San Diego County.